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January 17, 2023

Lily Cha, Senior Planner
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Clovis, California 93612
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Subject: Tract Map 6343 Project (Project)
Notice of Preparation (NOP)
State Clearinghouse No: **2022120483**

Dear Lily Cha:

The California Department of Fish and Wildlife (CDFW) received a NOP for a draft Environmental Impact Report (EIR) from the City of Clovis for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)).

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id*., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

In this role, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on Project activities that have the potential to adversely affect fish and wildlife resources. CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Clovis

Objective: The proposed project would consist of the annexation of 246 acres by the City of Clovis, and the development of 590 residential lots, averaging 3,329 square feet within the 71.54-acre project site. The proposed lots would be developed into single-family residences over time. Sixty-six outlot (a plot of undeveloped land) spaces that would potentially be developed into private roads, private parking, pedestrian walkways, landscaping, public utilities, and public park uses would also be included within the project site. No development is proposed within the remaining 174.46-acre annexation area surrounding the project site. The proposed project would include annexation of the 246-acre area from Fresno County jurisdiction to the City of Clovis. Any future

development occurring within the annexation area would require a separate project-specific analysis.

The proposed project would be developed in three phases:

Phase 1 – Phase 1 would include the development of 136 single-family residential units with an average size of 1,514 square feet per unit. Phase 1 would be located on the southern portion of the project site and would be accessed through one ingress and egress driveway located on Perrin Avenue. Phase 1 would include the construction of 44 parking spaces, an 8,745 square-foot community pool and recreation area, a 13,930 square-foot community park, 0.51 acre of landscaped areas, and drainage and pedestrian infrastructure improvements along Perrin Avenue. The southern extension of North Baron Avenue from East Behymer Avenue and the extension of Perrin and Hammel Avenue within the project site would be constructed during Phase 1.

Phase 2 – Phase 2 would include the development of 214 single-family residential units with an average size of 2,168 square feet per unit. Phase 2 would be located on the central portion of the project site and would be accessed through one gated ingress and egress driveway located along the future southern extension of Baron Avenue, and one driveway along Hammel Avenue. Phase 2 would include the construction of an approximately 26-foot-wide drainage channel along Perrin Avenue, approximately 0.35 acre of landscaped areas, as well as storm drainage and pedestrian infrastructure improvements along Perrin Avenue and Hammel Avenue.

Phase 3 – Phase 3 of the proposed project would include the development of 240 single-family residential units with an average size of 1,514 square feet per unit. Phase 3 would be located on the northern portion of the project site and would be accessed through two gated ingress and egress driveways located along the future southern extension of Baron Avenue, and through one gated driveway located along the future northern extension of Hammel Avenue. Phase 3 would include the construction of approximately 91 parking spaces, an approximately 9,985 square-foot pool and recreation area, approximately 0.65 acre of landscaped areas, and drainage and pedestrian infrastructure improvements along Baron Avenue. In addition, development of the project site would include infrastructure improvements for water services along the East Behymer Avenue frontage and Baron Avenue frontage, as well as stormwater management infrastructure improvements along the Perrin Avenue frontage. The proposed project would also construct a two-lane, approximately 49-foot-wide and 2,650-foot long extension of Baron Avenue south of East Behymer Avenue. The dirt-lined Enterprise Canal is adjacent to the Project site on the western side.

Location: Southwest of the intersection of East Behymer Avenue and North Sunnyside Avenue. Assessor Parcel Numbers (APNs): 556-040-07S, 556-040-08S, and 556-030-14S.

Timeframe: None given.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of Clovis in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, indirect, and cumulative impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document for this Project.

The NOP indicates that the EIR for the Project will consider potential environmental effects of the proposed Project to determine the level of significance of the environmental effect and will analyze these potential effects to the detail necessary to make a determination on the level of significance. The EIR will also identify and evaluate alternatives to the proposed Project. When an EIR is prepared, the specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation.

Special-Status Species: Based on aerial imagery, and species occurrence records from the California Natural Diversity Database (CNDDB, 2023), the proposed Project site and/or surrounding area is known to and/or has the potential to support special-status species, and these resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities. CDFW is concerned regarding potential impacts to special-status species including, but not limited to, the Federal and State threatened (FT/ST) California tiger salamander (*Ambystoma californiense*), the State threatened (ST) Swainson's hawk (*Buteo swainsoni*), the State candidate (SC) endangered species, Crotch bumble bee (*Bombus crotchii*), and the State species of special concern (SSC) burrowing owl (*Athene cunicularia*).

California Tiger Salamander (CTS)

The Project area is within the range of CTS and this species has been observed in several areas in the Project vicinity per CNDDB records. Review of aerial imagery indicates the presence of several wetland/ponded features in the Project's vicinity that may have the potential to support breeding CTS. In addition, the Project area or its immediate surroundings may support small mammal burrows, a requisite upland habitat feature for CTS.

Up to 75% of historic CTS habitat has been lost to development (Searcy et al. 2013). Decline in CTS populations is attributed to habitat loss and fragmentation; predation from, and competition with invasive species; hybridization; small mammal control; and contaminants (USFWS 2017).

CDFW advises avoidance for CTS include a minimum 50-foot no-disturbance buffer delineated around all small mammal burrows within and/or adjacent to the Project construction footprint. If burrow avoidance is not feasible, consultation with CDFW is warranted to determine if the Project can avoid take.

As part of the biological studies conducted in support of the CEQA document, CDFW requests protocol CTS surveys be performed to identify potential Project-related impacts to this species in and surrounding the Project footprint. These surveys and the associated impacts analysis should be conducted by a qualified biologist using the *Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander,* which were issued by CDFW and the USFWS in 2003. Please note that the protocol requires that surveys be conducted during at least two seasons, with sufficient precipitation, to be considered complete. If CTS are found on the Project site, "take" authorization is recommended by CDFW and would occur through the issuance of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b). In the absence of protocol surveys, the applicant can assume presence of CTS within the Project area and immediately focus on obtaining an ITP. For information regarding ITPs, please see the following link: https://www.wildlife.ca.gov/Conservation/CESA. Included in the ITP would be measures required to avoid and/or minimize direct "take" of CTS on the Project site, as well as measures to fully mitigate the impact of the "take."

Swainson's Hawk (SWHA) (Compensation for Foraging Habitat)

SWHA have the potential to nest within and near the Project site. The proposed Project will involve activities near large trees that may serve as potential nest sites. CDFW recommends that the biological studies conducted in support of the CEQA document include both protocol surveys for nesting SWHA within the project area and a 0.5 mile buffer surrounding the project and an analysis of the impacts of foraging habitat loss on this species as a result of the Project. All identified nests should be avoided by a 0.5 mile buffer to avoid take of SWHA.

Per Google historical imagery from 2021, the proposed Project area was composed of agricultural land that the SWHA could potentially utilize for foraging habitat. Current Google aerial imagery shows that a large portion of that resource has been altered by ground disturbing activities. Due to this issue, CDFW recommends compensation for the loss of SWHA foraging habitat to reduce impacts to SWHA foraging habitat to less than significant based on CDFW's Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (CDFG 1994), which recommends that mitigation for habitat loss occur within a minimum distance of 10 miles from known nest sites with the amount of habitat compensation dependent on nest proximity. In addition to fee title acquisition or a conservation easement recorded on property with suitable grassland habitat features, mitigation may occur by the purchase of conservation or suitable agricultural easements. Suitable agricultural easements would include areas limited to production

of crops such as alfalfa, dry land and irrigated pasture, and cereal grain crops. Vineyards, orchards, cotton fields, and other dense vegetation do not provide adequate foraging habitat.

CDFW recommends that in the event an active SWHA nest is detected during surveys and the 0.5 mile no-disturbance buffer around the nest cannot feasibly be implemented, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the issuance of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Crotch Bumble Bee (CBB)

The California Fish and Game Commission (Commission) determined listing CBB "may be warranted" on June 12, 2019, advancing the species to candidacy. The Commission's determination was challenged in court soon after, and candidacy was stayed during much of the ensuing litigation. A California court of appeal ultimately upheld the Commission's determination, and the state Supreme Court declined to review the case. On September 30, 2022, the court of appeal issued remittitur in the litigation, which had the legal effect of reinstating candidacy for CBB.

As of September 30, 2022, CBB is again a candidate species under CESA and as such, receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085). It is illegal to import, export, take (hunt, pursue, catch, capture, or kill, or attempt engage in any of these activities), possess, purchase, or sell CBB or any part or product thereof (Fish & G. Code, §§ 86, 2080, 2085).

CBB was once common throughout most of the central and southern California, however, it now appears to be absent from most of it, especially in the central portion of its historic range within California's Central Valley (Hatfield et al. 2014). Analyses by the Xerces Society et al. (2018) suggest there have been sharp declines in relative abundance by 98% and persistence by 80% over the last ten years.

CBB have the potential to occur within the vicinity of the Project site. Suitable CBB habitat includes areas of grasslands and upland scrub that contain requisite habitat elements, such as small mammal burrows. CBB primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, underbrush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2015). Overwintering sites utilized by CBB mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Therefore, ground disturbance and vegetation removal associated with Project implementation has the potential to significantly impact local CBB populations.

Without appropriate avoidance and minimization measures for CBB, potentially significant impacts associated with Project ground- and vegetation-disturbing activities include loss of foraging plants, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young and/or queens, in addition to direct mortality in violation of Fish and Game Code. CDFW recommends the CEQA document prepared for this Project include that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take.

Burrowing Owl (BUOW)

BUOW may occur near the Project site (CDFW 2023). BUOW inhabit open grassland or adjacent canal banks, ROWs, vacant lots, etc. containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. Review of aerial imagery indicates that some of the Project site is bordered by annual grassland and potentially fallow agricultural fields and may be present within the Project site.

Potentially significant direct impacts associated with subsequent activities include burrow collapse, inadvertent entrapment, nest abandonment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals. BUOW rely on burrow habitat year-round for their survival and reproduction. Habitat loss and degradation are considered the greatest threats to BUOW in California's Central Valley (Gervais et al. 2008). Therefore, subsequent ground-disturbing activities associated with the Project have the potential to significantly impact local BUOW populations. In addition, and as described in CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), excluding and/or evicting BUOW from their burrows is considered a potentially significant impact under CEQA.

CDFW recommends assessing presence/absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium's "Burrowing Owl Survey Protocol and Mitigation Guidelines" (CBOC 1993) and CDFW's Staff Report on Burrowing Owl Mitigation" (CDFG 2012). Specifically, CBOC and CDFW's Staff Report suggest three or more surveillance surveys conducted during daylight with each visit occurring at least three weeks apart during the peak breeding season (April 15 to July 15), when BUOW are most detectable.

CDFW recommends no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a

qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

If BUOW are found within these recommended buffers and avoidance is not possible, it is important to note that according to the Staff Report (CDFG 2012), exclusion is not a take avoidance, minimization, or mitigation method and is considered a potentially significant impact under CEQA. However, if necessary, CDFW recommends that burrow exclusion be conducted by qualified biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of 1 burrow collapsed to 1 artificial burrow constructed (1:1) as mitigation for the potentially significant impact of evicting BUOW. BUOW may attempt to colonize or re-colonize an area that will be impacted; thus, CDFW recommends ongoing surveillance, at a rate that is sufficient to detect BUOW if they return.

Nesting Birds

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified biologist conduct an assessment of nesting habitat during biological surveys in support of the project's CEQA document and include measures in the DEIR to conduct pre-construction surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance for each year that each phase of the project is in construction to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project sites to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

II. Editorial Comments and/or Suggestions

CDFW acknowledges that the mitigation measures in the Initial Study are appropriate and that we recommend they are included in the DEIR document.

CDFW requests that the DEIR fully identify potential impacts to biological resources, including the above-mentioned species. In order to adequately assess any potential impacts to biological resources, focused biological surveys should be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species and/or suitable habitat features may be present within the Project area. Properly conducted biological surveys, and the information assembled from them, are essential to identify any mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, and to identify any Project-related impacts under CESA and other species of concern.

Therefore, CDFW recommends the DEIR address potential impacts to these species and provide measurable mitigation measures that, as needed, will reduce impacts to less than significant levels. Information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols).

Federally Listed Species: CDFW also recommends consulting with the USFWS on potential impacts to Federally listed species, specifically, but not limited to, the FT California tiger salamander. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS to comply with FESA is advised well in advance of any ground disturbing activities.

Waters of the State and U.S.: Pursuant to Fish and Game Code section 5650, it is unlawful to deposit in, permit to pass into, or place where it can pass into "Waters of the

State" any substance or material deleterious to fish, plant life, or bird life, including non-native species. It is possible that without mitigation measures this Project could result in pollution of Waters of the State from storm water runoff or construction-related erosion. Potential impacts to the wildlife resources that utilize watercourses in the Project area include the following: increased sediment input from road or structure runoff; construction-related activity runoff associated with Project-related activities and implementation; and/or impairment of wildlife movement through the area. The Regional Water Quality Control Board and United States Army Corps of Engineers (USACE) also have jurisdiction regarding discharge and pollution to Waters of the State.

Water Rights: CDFW recommends the DEIR include a detailed analysis of the water rights and water entitlements that pertain to the Project, including whether any applications or change petitions will be filed. As stated previously, CDFW, as Trustee Agency, is consulted by the SWRCB during the water rights process to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Given the potential for impacts to sensitive species and their habitats, it is advised that required consultation with CDFW occur well in advance of the SWRCB water right application process.

Project Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in support of the project's CEQA document be used to develop and modify the project's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. When efforts to avoid and minimize have been exhausted, remaining impacts to sensitive biological resources should be mitigated to reduce impacts to a less than significant level, if feasible.

Cumulative Impacts: CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the project, even if those impacts are relatively small (i.e. less than significant). Cumulative impacts should be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and should be focused specifically on the resource, not the project. An appropriate resource study area should be identified and utilized for this analysis. At a minimum, all of the described associated road extensions, water service infrastructure improvements, and stormwater management projects should be included as projects that are reasonably foreseeable. Please note that CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CDFW appreciates the opportunity to comment on the Project to assist the City of Clovis in identifying and mitigating the Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). If you have any questions, please contact Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, or by electronic mail at Kelley.Nelson@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager

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LITERATURE CITED

California Department of Fish and Wildlife (CDFW). 2023. Biogeographic Information and Observation System (BIOS). https://www.wildlife.ca.gov/Data/BIOS. Accessed January 3, 2023.

CTS Literature Citations

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USFWS. 2017. Recovery Plan for the Central California Distinct Population Segment of the California Tiger Salamander (*Ambystoma californiense*). U. S. Fish and Wildlife Service, Region 8, Sacramento, California. June 2017.

SWHA Literature Citations

California Department of Fish and Game (CDFG). 1994. CDFW's Staff Report Regarding Mitigation Impacts to Swainson's Hawks. California Department of Fish and Game.

CBB Literature Citations

Goulson, D. 2010. Bumblebees: behaviour, ecology, and conservation. Oxford University Press, New York. 317pp.

Hatfield, R, S. Colla, S. Jepsen, L. Richardson, R. Thorp, and S. Foltz Jordan. 2014. Draft IUCN Assessments for North American *Bombus* spp. for the North American IUCN Bumble Bee Specialist Group. The Xerces Society for Invertebrate Conservation, www.xerces.org, Portland, OR.

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BUOW Literature Citations

California Burrowing Owl Consortium. 1993. Burrowing owl survey protocol and mitigation guidelines. April 1993.

CDFG. 2012. Staff Report on Burrowing Owl Mitigation. California Department of Fish and Game.

Gervais, J.A., D.D. Rosenberg, and L.A. Comrack. Burrowing Owl (*Athene cunicularia*) *in* Shuford, W.D. and T. Gardali, editors. 2008. California Bird Species of Special Concern.